EXHIBIT 101

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       IN THE UNITED STATES DISTRICT COURT
        FOR THE NORTHERN DISTRICT OF OHIO
3
                EASTERN DIVISION
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     IN RE: NATIONAL : HON. DAN A.
     PRESCRIPTION OPIATE : POLSTER
     LITIGATION
7
     APPLIES TO ALL CASES : NO.
8
                                1:17-MD-2804
9
            - HIGHLY CONFIDENTIAL -
10
    SUBJECT TO FURTHER CONFIDENTIALITY REVIEW
11
12
                February 15, 2019
13
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15
                 Videotaped deposition of
    GEORGE STEVENSON, taken pursuant to
16
    notice, was held at the offices of
    McCarter & English, LLP, 1600 Market
    Street, Philadelphia, Pennsylvania,
17
    beginning at 9:11 a.m., on the above
18
    date, before Michelle L. Gray, a
    Registered Professional Reporter,
19
    Certified Shorthand Reporter, Certified
    Realtime Reporter, and Notary Public.
20
21
22
           GOLKOW LITIGATION SERVICES
       877.370.3377 ph | 917.591.5672 fax
23
                 deps@golkow.com
2.4
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hell and not a godsend, right? MS. VANNI: Object to form. THE WITNESS: Well, yeah, I just r-for the record. I think that abuse a product or didn't abuse a product, whether they took an opioid like were contra to the indication on the label. So the title could be misleading. I don't know what caused their hell, the 12 hours of hell, just for the record. BY MS. SCULLION: A. I don't recall - O. Sorry. A. I don't recall any. Q. Sorry. A. I don't recall any. Q. Doy our ceall seeing any "Dear Doctor" letters concerning generic oxycodone ER? A. I don't recall any. Q. Doy our ceall seeing any "Dear Doctor" letters concerning generic oxycodone ER that told the doctors that that that that medication should not be overprescribed? A. I don't recall any. Q. Doy our ceall seeing any "Dear Doctor" letters concerning generic oxycodone ER. that told the doctors oxycodone ER. that told the doctors at the time dication should not be overprescribed? A. I don't recall any. A. I don't recall any. Q. Doy ou recall seeing any "Dear Doctor" letters concerning generic oxycodone ER. that told the doctors oxycodone ER. that told the doctors at the time medication should not be overprescribed? A. I don't recall any. A. I don't	inginy confidencial - Subject t	
MS. VANNI: Object to form. THE WITNESS: Well, yeah, I	Page 322	Page 324
THE WITNESS: Well, yeah, I just for the record, I think it's pure speculation to know whether they abused a product or didn't abuse a product, whether they took an opioid like OxyContin, drank alcohol, or or did other nefarious things that were contra to the indication on the label. So the title could be misleading. I don't know what caused their hell, the 12 hours of hell, just for the record. BY MS. SCULLION: OxyContin, drank alcohol, or or did other nefarious things that were contra to the indication on the label. OxyContin, drank alcohol, or or did other nefarious things that mericontral to the indication on the label. OxyContin, drank alcohol, or or did other nefarious things that mericontral to the indication on the label. OxyContin, drank alcohol, or or did other nefarious things that mericontral they took can opioid like OxyContin, drank alcohol, or or did other nefarious things that mericontral the label. OxyContin, drank alcohol, or or did other nefarious things that mericontral the label. OxyContin, drank alcohol, or or did other nefarious things that mericontral the label. OxyContin, drank alcohol, or or did other nefarious things that mericontral that he were contrated the label. OxyContin, drank alcohol, or or did other nefarious things that mericontral the label. Do you gong back to the label. Day Now, going back to the label. Day Now, going back to to stipulate though, it says to the low the label. Day Ox Pep. Page 323 Which discusses the AP article that came out, second AP article after Endo out, second AP ar	¹ hell and not a godsend, right?	¹ material to doctors. That I don't
4	² MS. VANNI: Object to form.	² recall.
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	Page 326		Page 328
1	will show you. I know you said you don't	1	to
	remember. Let me show you, so you know	2	A. But Cohn & Wolfe did not do
	the basis on which we are saying that.	3	any marketing or promotional materials
	You don't have to take my word for it.	4	for the generic business, just for
5	(Document marked for	5	Q. That's fine.
6	identification as Exhibit	6	A. For the record.
7	Endo-Stevenson-22.)	7	Q. That's fine.
	BY MS. SCULLION:	8	Here, here we're looking in
9	Q. Let me show you what's been	9	Exhibit 19 at what is more traditionally
	marked as Exhibit 22.	10	called public relations.
11	And Exhibit 22 is a copy of	11	A. Yes.
	Endo Health Solutions Inc. and Endo	12	Q. Okay. So let's we were
	Pharmaceutical Inc.'s excuse me, Endo		on the page communications imperatives.
	Pharmaceuticals Inc.'s supplemental	14	A. Yes.
	objections and responses to plaintiffs'	15	
			Q. And the strategy to
	second set of interrogatories numbers	17	neutralize critics/activists, right? A. Yes.
	and I'm not going to read the series of numbers.	18	
19	numbers.	19	Q. Just getting us back to where we are.
20	If you'll go to Page 35.	20	
21	A. Can I just ask a question?		Now, again, what's written
22	Q. Absolutely.	22	here is to neutralize the critics and
	A. What what is the date of	23	activists. It doesn't say for example,
24	this document?	24	engage in a thoughtful debate, right?
24	Q. Sure. The date of this	24	MS. VANNI: Object to form.
	Page 327		Page 329
l	document is November 15, 2018.	1	THE WITNESS: I had no way
2	A. 2018, okay.	2	of controlling what somebody
3	Q. Correct. If you'll go to	3	writes in a PowerPoint
4	Page 34.	4	presentation who worked for
5	A. 34.	5	another firm.
6	Q. And I'm looking at	1	BY MS. SCULLION:
7	Interrogatory Number 31.	7	Q. Just asking. It doesn't say
8	A. 34, okay.	8	that, right, it doesn't say engage in a
9	Q. Okay. And this is an	9	thoughtful debate, right?
	Q. Okay. And this is an	_	<u> </u>
	interrogatory, you can see, that asks	10	MS. VANNI: Object to form.
11	interrogatory, you can see, that asks Endo to identify all vendors, including	10 11	<u> </u>
11	interrogatory, you can see, that asks	10	MS. VANNI: Object to form.
11 12	interrogatory, you can see, that asks Endo to identify all vendors, including	10 11	MS. VANNI: Object to form. THE WITNESS: No, it says
11 12 13	interrogatory, you can see, that asks Endo to identify all vendors, including but not limited to, public relations	10 11 12 13	MS. VANNI: Object to form. THE WITNESS: No, it says neutralize, as we've already said
11 12 13 14	interrogatory, you can see, that asks Endo to identify all vendors, including but not limited to, public relations firms you have retained for purposes	10 11 12 13	MS. VANNI: Object to form. THE WITNESS: No, it says neutralize, as we've already said five times.
11 12 13 14	interrogatory, you can see, that asks Endo to identify all vendors, including but not limited to, public relations firms you have retained for purposes relating to opioids. And it it asks	10 11 12 13 14	MS. VANNI: Object to form. THE WITNESS: No, it says neutralize, as we've already said five times. BY MS. SCULLION:
11 12 13 14 15	interrogatory, you can see, that asks Endo to identify all vendors, including but not limited to, public relations firms you have retained for purposes relating to opioids. And it it asks for certain details.	10 11 12 13 14 15	MS. VANNI: Object to form. THE WITNESS: No, it says neutralize, as we've already said five times. BY MS. SCULLION: Q. It doesn't say give
11 12 13 14 15 16	interrogatory, you can see, that asks Endo to identify all vendors, including but not limited to, public relations firms you have retained for purposes relating to opioids. And it it asks for certain details. And on the next page, 35,	10 11 12 13 14 15	MS. VANNI: Object to form. THE WITNESS: No, it says neutralize, as we've already said five times. BY MS. SCULLION: Q. It doesn't say give considered attention to the concerns of a
11 12 13 14 15 16 17	interrogatory, you can see, that asks Endo to identify all vendors, including but not limited to, public relations firms you have retained for purposes relating to opioids. And it it asks for certain details. And on the next page, 35, you see listed under vendor, Cohn &	10 11 12 13 14 15 16	MS. VANNI: Object to form. THE WITNESS: No, it says neutralize, as we've already said five times. BY MS. SCULLION: Q. It doesn't say give considered attention to the concerns of a community devastated by the opioid
11 12 13 14 15 16 17 18	interrogatory, you can see, that asks Endo to identify all vendors, including but not limited to, public relations firms you have retained for purposes relating to opioids. And it it asks for certain details. And on the next page, 35, you see listed under vendor, Cohn & Wolfe. It says, "/GCI Health." And it	10 11 12 13 14 15 16 17	MS. VANNI: Object to form. THE WITNESS: No, it says neutralize, as we've already said five times. BY MS. SCULLION: Q. It doesn't say give considered attention to the concerns of a community devastated by the opioid epidemic, it doesn't say that, right?
11 12 13 14 15 16 17 18 19	interrogatory, you can see, that asks Endo to identify all vendors, including but not limited to, public relations firms you have retained for purposes relating to opioids. And it it asks for certain details. And on the next page, 35, you see listed under vendor, Cohn & Wolfe. It says, "/GCI Health." And it identifies the purpose for hiring that	10 11 12 13 14 15 16 17 18	MS. VANNI: Object to form. THE WITNESS: No, it says neutralize, as we've already said five times. BY MS. SCULLION: Q. It doesn't say give considered attention to the concerns of a community devastated by the opioid epidemic, it doesn't say that, right? MS. VANNI: Objection to
11 12 13 14 15 16 17 18 19	interrogatory, you can see, that asks Endo to identify all vendors, including but not limited to, public relations firms you have retained for purposes relating to opioids. And it it asks for certain details. And on the next page, 35, you see listed under vendor, Cohn & Wolfe. It says, "/GCI Health." And it identifies the purpose for hiring that vendor as marketing and promotional	10 11 12 13 14 15 16 17 18 19 20	MS. VANNI: Object to form. THE WITNESS: No, it says neutralize, as we've already said five times. BY MS. SCULLION: Q. It doesn't say give considered attention to the concerns of a community devastated by the opioid epidemic, it doesn't say that, right? MS. VANNI: Objection to form.
11 12 13 14 15 16 17 18 19 20 21	interrogatory, you can see, that asks Endo to identify all vendors, including but not limited to, public relations firms you have retained for purposes relating to opioids. And it it asks for certain details. And on the next page, 35, you see listed under vendor, Cohn & Wolfe. It says, "/GCI Health." And it identifies the purpose for hiring that vendor as marketing and promotional materials, public relations.	10 11 12 13 14 15 16 17 18 19 20 21	MS. VANNI: Object to form. THE WITNESS: No, it says neutralize, as we've already said five times. BY MS. SCULLION: Q. It doesn't say give considered attention to the concerns of a community devastated by the opioid epidemic, it doesn't say that, right? MS. VANNI: Objection to form. THE WITNESS: No, it doesn't

Tand and activists, right?		D 220	_	D 222
2 A. Yes, that's what it says. 3 Q. Right. And common 4 understanding of the term "neutralize" 5 means to stop something from being 6 effective, right? 7 MS. VANNI: Object to form. 8 THE WITNESS: I don't know 9 how the – what the intent of the 10 meaning was in the PowerPoint 11 presentation, since I didn't write 12 it. 13 BY MS. SCULLION: 14 Q. That's – that's an 15 understanding of what the – the term 16 "neutralize" does mean: Stop something 17 from being effective? 18 MS. VANNI: Object to form. 19 THE WITNESS: One could have 10 numerous, numerous definitions. 20 Who knows what was in the state of 21 mind of the individual who wrote 22 it. 24 BY MS. SCULLION: 25 Who knows what was a strategy to 4 neutralize critics and activists. That's 5 what they did write, right? 6 MS. VANNI: Object to form. 7 THE WITNESS: That's what 8 they wrote, yes. 9 BY MS. SCULLION: 10 Q. Okay. And then if you'll go 4 neutralize critics and activists. That's 5 what they did write, right? 6 MS. VANNI: Object to form. 7 THE WITNESS: That's what 8 they wrote, yes. 9 BY MS. SCULLION: 11 Do you see that? 12 Do you see that? 13 strategy for the 3218 launch. 14 Do you see that? 15 A. What does it say at the top? 16 Q. Media strategy for 3218 18 A. Media – media launch tab, 19 do you reckon that is what it is? 10 MS. VANNI: ti's not up on 11 the screen. 12 Tapologize. 13 A. Oh, is that it? 14 papologize, we don't have page numbers. 15 Q. That's it. Thank you. 16 A. Oh, is that it? 16 A. Oh, is that it? 17 Q. That's it. Thank you. 16 A. Oh, is that it? 20 That's it. Thank you. I 21 apologize, we don't have page numbers. 24 apologize, we don't have page numbers. 25 A. Tapologize, 26 A. Yes. 26 Q. Okay. And then if you go to the next page, in discussing the pros and 15 to tonduct on some of option, which is to conduct 15 to consort one option, which is to conduct 15 to consort one option, which is to conduct 15 to consort one option, which is to conduct 15 top tier briefings, do you see that? 27 Do you see that? 28 The Witness of the launch of		Page 330		Page 332
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4 again. 5 means to stop something from being 6 effective, right? 7 MS. VANNI: Object to form. 8 THE WITNESS: I don't know 9 how the what the intent of the 10 meaning was in the PowerPoint 11 presentation, since I didn't write 12 it. 13 BY MS. SCULLION: 14 Q. That's that's an 15 understanding of what the the term 16 "neutralize" does mean: Stop something 17 from being effective? 18 MS. VANNI: Object to form. 19 THE WITNESS: One could have 20 numerous, numerous definitions. 21 Who knows what was in the state of 22 mind of the individual who wrote 23 it. 24 BY MS. SCULLION: 25 Well, the one thing we do 26 know is they they wrote that there 3 must the must have was a strategy to 4 neutralize critics and activists. That's 4 what they did write, right? 5 MS. VANNI: Object to form. 7 THE WITNESS: That's what 8 they wrote, yes. 9 BY MS. SCULLION: 10 Q. Okay. And then if you'll go 11 two more pages in. This is part of the 12 presentation of options for media 13 strategy for the 3218 launch. 14 Do you see that? 15 A. What does it say at the top? 16 A. What does it say at the top? 17 MS. VANNI: Object to form. 18 THE WITNESS: That's what 19 they did write, right? 19 MS. VANNI: Object to form. 20 Okay. And then if you'll go 21 two more pages in. This is part of the 22 presentation of options for media 23 strategy for the 3218 launch. 24 MS. VANNI: It's not up on 25 MS. VANNI: It's not up on 26 MS. VANNI: It's not up on 27 the screen. 28 WMS. SCULLION: 29 MS. VANNI: It's not up on 20 the screen. 20 ON. That's the one. Media 20 Do, On. That's the one. Media 21 Do you see that? 22 Do you see that? 23 Mad again, this is for the launch of 24 pot problem. My mistake. 25 A. That's all right. No 26 A. That's all right. No 27 Do, Val, And then if you go to the next 28 papelogize, we don't have page numbers. 29 Do, Val, And then if you'll go the prevention of product, right? 29 Do, Val, And then if you'll go the rest page, in discussing the pros and the cons of one option, which is to conduct 29 Do you see that? 20 A	2	A. Yes, that's what it says.	2	1 0
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6 effective, right? 7 MS. VANNI: Object to form. 8 THE WITNESS: I don't know how the what the intent of the meaning was in the PowerPoint 1 presentation, since I didn't write 1 it. 13 BY MS. SCULLION: 14 Q. That's that's an 1 generic oxycodone ER product, right? 15 understanding of what the the term 16 "neutralize" does mean: Stop something 17 from being effective? 18 MS. VANNI: Object to form. 19 THE WITNESS: One could have numerous, unmerous definitions. 20 Who knows what was in the state of 21 mind of the individual who wrote 22 it. 24 BY MS. SCULLION: 25 Page 331 2 Q. Well, the one thing we do 2 know is they they wrote that there 3 must the must have was a strategy to 4 neutralize critics and activists. That's what they did write, right? 26 MS. VANNI: Object to form. THE WITNESS: That's what they wrote, yes. 29 BY MS. SCULLION: 20 Q. Okay. And then if you'll go 11 two more pages in. This is part of the 12 presentation of options for media strategy for 3218 1 aunch, three options? 18 A. Media media launch tab, 40 do you reckon that is what it is? 20 MS. VANNI: It's not up on 12 the screen. 21 BY MS. SCULLION: 22 BY MS. SCULLION: 23 A. That's all right. No 24 And again, this is for the launch of 12 generic oxycodone ER product, right? 25 A. Yes. 26 A. Oh, is that it? 27 A. That's all right. No 28 A. That's all right. No 29 And again, this is for the launch of 12 generic oxycodone ER product, right? 3 And again, this is for the launch of 12 generic oxycodone ER product, right? 4 La Ves. 4 Q. Okay. And then if you go to to the next page, in discussing the pros and 18 cons of one option, which is to conduct 19 top tier briefings, do you see under the cons section, fourth bullet point down 20 cons section, fourth bullet point down 21 the next page 331 page, which is discussing another 22 potential media strategy option. Again, 3 under the cons we see listed, "Endo 4 blues' story emerges." 5 Do you see that? 6 A. Yes. 7 Q. And same thing on the last 8 potential strategy under the cons, "Endo 5 bl	4	understanding of the term "neutralize"	4	again.
7 Q. That's it. Thank you. I 8 phow the what the intent of the 10 meaning was in the PowerPoint 11 presentation, since I didn't write 12 it. 13 BY MS. SCULLION: 14 Q. That's that's an 15 understanding of what the the term 16 "neutralize" does mean: Stop something 17 from being effective? 18 MS. VANNI: Object to form. 19 THE WITNESS: One could have 10 numerous, numerous definitions. 11 Q. Well, the one thing we do 12 know is they they wrote that there 13 must the must have was a strategy to 14 neutralize critics and activists. That's 15 what they did write, right? 16 MS. VANNI: Object to form. 17 THE WITNESS: That's what they wrote, yes. 18 BY MS. SCULLION: 19 Do you see that? 10 Q. Okay. And then if you'll go 11 two more pages in. This is part of the 12 presentation of options for media strategy for the 3218 launch, three options? 18 A. What does it say at the top? 19 Q. Media strategy for 3218 19 do you reekon that is what it is? 20 MS. VANNI: It's not up on the screen. 21 BY MS. SCULLION: 22 BY MS. SCULLION: 23 Q. Oh. That's the one. Media 24 Do you see that? 25 Do you see that? 26 MS. VANNI: It's not up on the screen. 27 MS. VANNI: It's not up on the screen. 28 BY MS. SCULLION: 29 WMS. SCULLION: 20 ONATION: It's not up on the screen. 20 MS. VANNI: It's not up on the screen. 21 WS. SCULLION: 22 BY MS. SCULLION: 23 Q. Oh. That's the one. Media	5	means to stop something from being	5	Q. Yeah.
THE WITNESS: I don't know how the what the intent of the meaning was in the PowerPoint presentation, since I didn't write it. The Witness of the product of the problem it presentation, since I didn't write it. What is a multiply of the individual who wrote it. Who knows what was in the state of mind of the individual who wrote it. Who knows what was in the state of mind of the individual who wrote it. Who know is they they wrote that there mind of the individual who wrote it. Who wis they wid write, right? MS. VANNI: Object to form. Who knows what was a strategy to hand they did write, right? MS. VANNI: Object to form. THE WITNESS: That's what they wrote, yes. Who knows that was a strategy to hand they did write, right? MS. VANNI: Object to form. THE WITNESS: That's what they provide that there are presentation of options for media strategy for the 3218 launch. Who knows what was in the state of mind of the individual who wrote it. Who know is they they wrote that there are in the word i	6	effective, right?	6	A. Oh, is that it?
how the what the intent of the meaning was in the PowerPoint presentation, since I didn't write it. 3 BY MS. SCULLION: 4 Q. That's that's an 5 understanding of what the the term 6 "neutralize" does mean: Stop something 7 from being effective? 8 MS. VANNI: Object to form. 9 THE WITNESS: One could have numerous, numerous definitions. 22 mind of the individual who wrote 3 it. 24 BY MS. SCULLION: 1 Q. Well, the one thing we do 2 know is they they wrote that there 3 must the must have was a strategy to 4 neutralize critics and activists. That's 5 what they did write, right? 6 MS. VANNI: Object to form. 7 THE WITNESS: That's what 1 they wrote, yes. 9 BY MS. SCULLION: 10 Q. Okay. And then if you'll go 11 Q. Well, the one thing we do 2 know is they they wrote that there 3 must the must have was a strategy to 4 neutralize critics and activists. That's 5 what they did write, right? 6 MS. VANNI: Object to form. 7 THE WITNESS: That's what 1 they wrote, yes. 9 BY MS. SCULLION: 10 Q. Okay. And then if you'll go 11 Q. Well, the one thing we do 2 know is they they wrote that there 3 must the must have was a strategy to 4 neutralize critics and activists. That's 5 what they did write, right? 6 MS. VANNI: Object to form. 7 THE WITNESS: That's what 1 they wrote, yes. 9 BY MS. SCULLION: 10 Q. Okay. And then if you'll go 11 two more pages in. This is part of the 12 presentation of options for media 13 strategy for the 3218 launch. 14 Do you see that? 15 A. Yes. 16 Q. Okay. And sten if you'll go 17 the next page, in discussing the pros and 2 cons of one option, which is to conduct 2 top tier briefings, do you see under the 2 cons section, fourth bullet point down 2 cons section, fou	7	MS. VANNI: Object to form.	7	Q. That's it. Thank you. I
meaning was in the PowerPoint presentation, since I didn't write it	8	THE WITNESS: I don't know	8	apologize, we don't have page numbers.
presentation, since I didn't write it.	9	how the what the intent of the	9	A. That's all right. No
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Highly Confidential - Subject to	o raremer communication have
Page 334	Page 336
¹ before.	Q. And this is indicated to be
² Q. Okay.	² Chapter 35 of this book. And it is
MS. SCULLION: Can I have	³ entitled "Oxymorphone Abuse Among
4 tab Tab 74 and 72.	⁴ Narcotic Addicts."
5 (Document marked for	5 Do you see that?
6 identification as Exhibit	6 A. Yes.
⁷ Endo-Stevenson-23.)	Q. And it discusses in the
8 BY MS. SCULLION:	8 first line, "Numorphan (oxymorphone), a
⁹ Q. Let me first hand you what's	9 narcotic analgesic developed and first
been marked Exhibit 23.	marketed by Endo Laboratories in 1966 has
Exhibit 23 is an excerpt	become a drug abuse" "a drug of abuse
12 from a book called "Drug Abuse: Current	¹² among a sizable segment of the narcotic
13 concerns and research."	
	addret population.
71. What is the date of this	Do you see that? A. Yes.
document.	
Q. If you it turn to the second	Q. Okay. And I tillik we
page of the exhibit, you can see that	discussed earlier, oxymorphone was the
this was a book that was copyrighted in	opioid Endo used in the Opana IR and ER
19 1972.	products, right?
A. Okay. Thank you.	MS. VANNI: Object to form.
Q. Okay. And again I don't	THE WITNESS: It was a brand
have all the page numbers, so it's a	product, which I had no
23 little bit hard to direct you. But,	involvement.
²⁴ yeah, in the upper right-hand corner we	24 BY MS. SCULLION:
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, , , ,	Page 337 Q. I'm just asking the you
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